

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE:	:	
Melissa M. Caldwell	:	
	:	Chapter 13
Debtor	:	
	:	Case No. 1:24-00927-HWV
	:	
Credit Acceptance Corporation	:	
	:	
Movant	:	
	:	Answer to
v.	:	Motion for Relief from Stay
	:	
Melissa M. Caldwell	:	
and	:	
Jack N. Zaharopoulos, Trustee,	:	
Respondents	:	

DEBTOR'S REPLY TO MOTION  
OF CREDIT ACCEPTANCE CORPORATION

AND NOW, this 19<sup>th</sup> day of May, 2025, comes the respondent, Melissa M. Caldwell, by and through her counsel, the CGA Law Firm, E. Haley Rohrbaugh, Esquire, and does file the within response averring that:

1. Admitted.
2. Denied.
3. Denied. The exhibit speaks for itself.
4. The document speaks for itself.
5. It is admitted that the Debtor has failed to make certain post-petition mortgage payments because of some financial difficulties. However, the Debtor filed an Amended Chapter 13 Plan on May 13, 2025, which cures post-petition payments.

WHEREFORE, it is requested that the relief sought by Credit Acceptance Corporation be denied.

Respectfully submitted,  
CGA Law Firm

/s/E. Haley Rohrbaugh, Esquire  
E. Haley Rohrbaugh, Esquire  
Sup. Ct. I.D. No. 323803  
Counsel for Debtors  
135 North George Street  
York, PA 17401  
(717) 848-4900

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CERTIFICATE OF SERVICE

I hereby certify that on May 19, 2025, service upon all interested parties indicated below was made by sending a true and correct copy of the Answer to Motion for Relief, by ECF and/or regular US Mail, postage prepaid, upon:

Jack N. Zaharopoulos  
Standing Chapter 13 Trustee

William E. Craig, Esquire  
Eisenberg Gold & Agrawal, P.C.  
1040 Kings Highway, North #200  
Cherry Hill, NJ 08034

/s/E. Haley Rohrbaugh, Esquire  
E. Haley Rohrbaugh, Esquire